

EXHIBIT 4

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DAN BUNKERING (AMERICA) INC.

Plaintiff,

V.

SWIBER MARINE MEXICO, S.A. DE
C.V., RANGER OFFSHORE, INC.,
IN PERSONAM
AND M/V SWIBER ADA *IN REM*

Defendants.

[Decorative separator consisting of a series of repeating scroll-like motifs]

CIVIL ACTION NO.: 4:20-cv-00321
IN ADMIRALTY, Rule 9(h)(C)

AMENDED DECLARATION OF ANACAROLINA ESTABA

1. I am more than 18 years old, have never been convicted of a felony or crime involving moral turpitude, and am in all respects competent to provide this Amended Declaration (the “Declaration”). I am an attorney with Foley and Lardner LLP (“Foley”) in Houston, Texas and serve as counsel to Plaintiff Dan Bunkering (America) Inc. (“Dan Bunkering”) in the captioned case. I have been practicing law for nineteen years. A significant amount of my practice over the last nineteen years part has been representing clients in maritime matters in federal court. I am duly admitted to practice law in the courts of the State of Texas and the United States District Court for the Southern District of Texas. Unless otherwise indicated, I have personal knowledge of the facts stated herein.

2. I make this Declaration in support of Dan Bunkering's Motion for Default Judgment (the "Motion") in this matter against Defendant Ranger Offshore Inc. ("Ranger").

3. Dan Bunkering filed an Amended Verified Complaint on June 9, 2020. *See* Motion, Exhibit 1.

4. On February 28, 2020, Dan Bunkering served Ranger by serving its registered agent CT Corporation. *See* Motion, Exhibit 2. Proof of service on Dan Bunkering was filed with the Court on March 18, 2020. *Id.*

5. Ranger did not file and answer to Dan Bunkering.

6. Ranger did not file motions under Federal Rules of Civil Procedure 12 or 56.

7. Ranger did not take any action nor file any document that indicated its intent to defend the lawsuit.

8. Ranger is a corporation and therefore is not a minor, incompetent, nor in the military service.

9. In my capacity as counsel for Dan Bunkering, I have either performed or participated in the supervision of the performance of all legal work done for Dan Bunkering in connection with this case. I have also participated in the preparation, review and transmission of Foley's invoices for attorneys' fees and costs. Further, in connection with this Declaration, I have reviewed my firm's litigation file to reinforce my personal knowledge of the nature and scope of the legal work done on Dan Bunkering's behalf in connection with this action.

10. I was involved in and primarily responsible for the work of Foley's attorneys in this matter. I have reviewed Foley's billing statements on this matter and am familiar with the experience, qualifications, and hourly billing rates of the attorneys at Foley who worked on this matter, as well as the tasks and activities performed by each Foley attorney on this case. My hourly billing rate is \$475.00. The hourly billing rate of other Foley attorneys working on this

case are: Peter A. McLauchlan \$750.00, Miguel Angel Hernandez Romo \$585.00 and Laura Jimenez O'Farrill \$327.62.

11. In conducting legal work for Dan Bunkering, I have prepared motions, briefs, pleadings and supporting declarations; identified, prepared, and assembled supporting evidence; communicated with the client and coordinated work by Mexican counsel to carry out the arrest of *M/V Swiber ADA*, a Mexican flag offshore supply ship, IMO 9502154, Mexican flag (*matricula* 04023195324) in Mexico that benefited from marine fuel ordered from Dan Bunkering; and managed the case on a day-to-day basis. I was involved in all aspects of the case and it was my usual practice to review and revise all pleadings and briefing. Considering the foregoing, it is my opinion that \$133,979.67 is a reasonable and necessary amount of attorneys' fees for this matter. Attached hereto as "Exhibit A" is a copy of Foley's invoices.

12. In determining the reasonableness of the fees for the services Foley rendered herein, I have considered the following standards set forth in TEXAS DISCIPLINARY R. PROF. CONDUCT 1.04, *reprinted in* TEX. GOV'T CODE, tit. 2 subtit. G app. (State Bar Rules, Art. 10 § 9) and *Arthur Andersen v. Perry Equipment Corp.*, 945 S.W.2d 812 (Tex. 1997): (1) the time and labor required; (2) the novelty and difficulty of the questions presented; (3) the skill required to perform the legal services properly; (4) the preclusion of other employment due to acceptance of the case; (5) the customary fee charged in the locality for similar legal services; (6) whether the fee is fixed or contingent; (7) the time limitations imposed by the client or the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation and ability of the attorneys; and (10) the nature and length of the professional relationship with the client.

13. Having considered the matters discussed herein, including the nature and extent of the services supplied by Foley, the value of the services according to the customary fee and

quality of the legal work, the *Arthur Anderson* factors and other legal authorities cited herein, \$133,979.67 is a reasonable and necessary amount of attorneys' fees for this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this July 9, 2020.



ANACAROLINA ESTABA

EXHIBIT A



FOLEY GARDERE
1000 LOUISIANA STREET
SUITE 2000
HOUSTON, TEXAS 77002-2099
TELEPHONE (713) 276-5500
FACSIMILE (713) 276-5555
WWW.FOLEY.COM

Bunker Holding A/S for:
Dan-Bunkering (America) Inc.
[REDACTED]

Date: February 17, 2020
Invoice No.: 40329588
Our Ref. No.: 114749-0109

Services through January 31, 2020

Amount due for professional services rendered regarding Swiber Offshore Mexico, Ranger Offshore, Inc. in Personam and M/V Swiber ADA in Rem	\$29,641.50
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Total Expenses:	\$400.00
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Total Amount Due:	\$30,041.50
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Please reference your account number 114749-0109 and your invoice
number 40329588 with your remittance payable to Foley & Lardner LLP.
Payment is due promptly upon receipt of our invoice.

Federal Employer Number:
[REDACTED]

Dan-Bunkering (America), Inc.
 Our Ref. No.: 114749-0109
 Invoice No.: 40329588

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 Foley Gardere
 February 17, 2020

Professional Services Detail

Date	Attorney/Description	Hours
01/10/20	A. Estaba-Herrera (AEH) Preliminary research about [REDACTED] Swiber's [REDACTED]	0.90
01/10/20	P. McLauchlan (PM) Review [REDACTED] correspondence regarding [REDACTED] [REDACTED]. Investigate Swiber [REDACTED] Analyze options. Investigate [REDACTED] [REDACTED]	2.40
01/13/20	P. McLauchlan (PM) Investigate [REDACTED] [REDACTED] Review court documents. Investigate vessel status. Outline complaint [REDACTED]	3.90
01/14/20	A. Estaba-Herrera (AEH) Research information regarding [REDACTED] [REDACTED] and coordinate conference call with Mexican counsel.	0.90
01/14/20	P. McLauchlan (PM) Investigate [REDACTED] Investigate [REDACTED] [REDACTED] Draft client update. Investigate [REDACTED] [REDACTED] Review [REDACTED] and draft procedural report to client regarding [REDACTED]	4.90
01/15/20	A. Estaba-Herrera (AEH) Conference call with Mexican counsel regarding [REDACTED] [REDACTED] prepare correspondence to counsel in Mexico regarding same.	1.00
01/15/20	P. McLauchlan (PM) Analyze procedural issues [REDACTED] Investigate [REDACTED] [REDACTED] Teleconference with local counsel regarding [REDACTED] [REDACTED]. Outline client report.	2.70
01/16/20	A. Estaba-Herrera (AEH) Make additional revisions to correspondence to [REDACTED] related to [REDACTED]; prepare correspondence to counsel in Mexico related to [REDACTED], [REDACTED] requirements and supportive documentation [REDACTED]	1.50

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 40329588

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February 17, 2020

01/16/20	P. McLauchlan (PM)	3.20
	Investigate [REDACTED]. Draft client update. Prepare for and attend to teleconference with [REDACTED]. Coordinate [REDACTED].	
01/17/20	A. Estaba-Herrera (AEH)	0.90
	Receive and comment [REDACTED] from Mexican counsel and send correspondence to Mexican counsel regarding same.	
01/17/20	P. McLauchlan (PM)	1.70
	Work on Mexico [REDACTED] Teleconference regarding [REDACTED] Correspondence regarding same. Check on [REDACTED]	
01/21/20	A. Estaba-Herrera (AEH)	0.70
	Exchange various correspondence with Mexican counsel regarding [REDACTED], and make revisions to [REDACTED]	
01/22/20	A. Estaba-Herrera (AEH)	1.50
	Continue filling [REDACTED] review public records and prepare correspondence to [REDACTED] with [REDACTED].	
01/22/20	P. McLauchlan (PM)	1.90
	Work on Mexico [REDACTED] Outline [REDACTED] documents. Coordinate with client and draft memo regarding [REDACTED]	
01/23/20	A. Estaba-Herrera (AEH)	1.00
	Make revisions to [REDACTED] in English and Spanish; contact Capitol Services to confirm [REDACTED] and issuance of [REDACTED]	
01/23/20	P. McLauchlan (PM)	2.40
	Work on documents for court. Draft client update regarding [REDACTED].	
01/24/20	A. Estaba-Herrera (AEH)	3.50
	Meeting and correspondence to Mexican counsel regarding [REDACTED]; review and request [REDACTED] from client [REDACTED]; coordinate [REDACTED] with CT Corporation; prepare list of documents for [REDACTED] prepare complaint [REDACTED]	
01/24/20	P. McLauchlan (PM)	3.90
	Prepare for and attend to meetings with [REDACTED] Coordinate with Mexico regarding [REDACTED] Work on U.S. federal [REDACTED] Coordinate for apostille on [REDACTED]	

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 40329588

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Foley Gardere

February 17, 2020

01/27/20	P. McLauchlan (PM) Work on court papers and [REDACTED] for client execution. Collate exhibits. Draft client [REDACTED].	1.90
01/27/20	P. McLauchlan (PM) Investigate [REDACTED] review Secretary of State records and draft client update [REDACTED]	0.80
01/28/20	A. Estaba-Herrera (AEH) Exchange various correspondence with Mexican counsel related to [REDACTED] [REDACTED]; prepare correspondence to client regarding same; prepare exhibits for filing with Complaint.	1.00
01/28/20	P. McLauchlan (PM) Finalize papers for court and file same. Draft client [REDACTED]	1.70
01/29/20	A. Estaba-Herrera (AEH) Conference call and various correspondence with local counsel related to [REDACTED] [REDACTED].	0.10
01/29/20	P. McLauchlan (PM) Receive and review documents from [REDACTED] Collate same and draft client [REDACTED]. Coordinate with Mexico.	1.90
01/30/20	A. Estaba-Herrera (AEH) Receive and respond to [REDACTED] correspondence regarding [REDACTED]; review court notice regarding i [REDACTED].	0.30
01/31/20	A. Estaba-Herrera (AEH) Various correspondence with Mexican counsel re [REDACTED].	0.40

Hours Total: 47.00

Services Total: \$29,641.50

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Dollars
Peter McLauchlan	PM	Partner	33.30	\$705.00	\$23,476.50
Anacarolina Estaba-Herrera	AEH	Special Counsel	13.70	\$450.00	\$6,165.00
Totals			47.00		\$29,641.50

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 40329588

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Foley Gardere

February 17, 2020

Expenses Incurred

Description	Amount
Recording / Filing Fees	\$400.00
Expenses Incurred Total	\$400.00

Certain services and expenses, which involve payments made to third parties, include an additional charge based upon our internal costs with respect to those services and expenses.



FOLEY GARDERE
1000 LOUISIANA STREET
SUITE 2000
HOUSTON, TEXAS 77002-2099
TELEPHONE (713) 276-5500
FACSIMILE (713) 276-5555
WWW.FOLEY.COM

Dan-Bunkering (America), Inc.

Date: February 17, 2020
Invoice No.: 40329588
Our Ref. No.: 114749-0109

Remittance Advice

Current Invoice:

02/17/20 - 40329588 \$30,041.50

Total Amount Due: \$30,041.50

Should you wish to remit your payment via check, please mail checks to:

Foley & Lardner LLP
P.O. Box 660256
Dallas, Texas 75266-0256

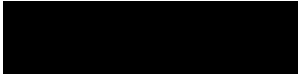
Should you wish to remit your payment via wire ACH or WIRE transfer, please include invoice no. 40329588 as an addenda or reference and forward to:

Foley & Lardner LLP
Amegy Bank a division of Zions
Bancorporation, N.A.
2501 North Harwood Street
Dallas, Texas 75201
ABA No.: [REDACTED]
Acct. No. [REDACTED]
Swift Code: [REDACTED]
(foreign wires only)

Please send remittance advice and questions to
TexasAR@foley.com



FOLEY GARDERE
 1000 LOUISIANA STREET
 SUITE 2000
 HOUSTON, TEXAS 77002-2099
 TELEPHONE (713) 276-5500
 FACSIMILE (713) 276-5555
 WWW.FOLEY.COM

Bunker Holding A/S for:
 Dan-Bunkering (America) Inc.


Date: March 12, 2020
 Our Ref. No.: 114749-0109

Statement of Account

Outstanding Invoices:

Date	Invoice No.	Amount	Credits	Balance
02/17/2020	40329588	\$30,041.50	\$0.00	\$30,041.50
Total Balance Outstanding:				\$30,041.50

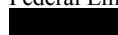
Current Invoice:

Date	Invoice No.	Amount	Credits	Balance
03/12/2020	40342153	\$11,218.50	\$0.00	\$11,218.50
Total Amount Due:				\$41,260.00

Please note that as of February 1, 2020, there may be certain matters on which hourly legal fees have been adjusted. This may or may not affect you. Please contact your principal attorney at the Firm if you have questions.

Please reference your account number 114749-0109 and your invoice
 number 40342153 with your remittance payable to Foley & Lardner LLP.
 Payment is due promptly upon receipt of our invoice.

Federal Employer Number:





FOLEY GARDERE
1000 LOUISIANA STREET
SUITE 2000
HOUSTON, TEXAS 77002-2099
TELEPHONE (713) 276-5500
FACSIMILE (713) 276-5555
WWW.FOLEY.COM

Bunker Holding A/S for:
Dan-Bunkering (America) Inc.



Date: March 12, 2020
Invoice No.: 40342153
Our Ref. No.: 114749-0109

Services through February 29, 2020

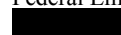
Amount due for professional services rendered regarding	\$11,218.50
Swiber Offshore Mexico, Ranger Offshore, Inc. in Personam and M/V	
Swiber ADA in Rem	

Amount Due:	\$11,218.50
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Please note that as of February 1, 2020, there may be certain matters on which hourly legal fees have been adjusted. This may or may not affect you. Please contact your principal attorney at the Firm if you have questions.

Please reference your account number 114749-0109 and your invoice number 40342153 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of our invoice.

Federal Employer Number:



Dan-Bunkering (America), Inc.
 Our Ref. No.: 114749-0109
 Invoice No.: 40342153

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 Foley Gardere
 March 12, 2020

Professional Services Detail

Date	Attorney/Description	Hours
01/17/20	L. Jimenez-O'Farrill (LJOF) Draft of the POA according to the different [REDACTED] Law.	0.60
01/30/20	L. Jimenez-O'Farrill (LJOF) Drafting of a requirement letter, [REDACTED]	0.70
02/04/20	A. Estaba-Herrera (AEH) Review and comment on Mexican counsel letter to [REDACTED] [REDACTED]; discuss with Mexican counsel status of [REDACTED]	0.70
02/05/20	P. McLauchlan (PM) Draft correspondence regarding [REDACTED] and analyze issues regarding [REDACTED] in Mexico.	0.60
02/06/20	A. Estaba-Herrera (AEH) Receive and respond to Mexican counsel correspondence regarding [REDACTED].	0.20
02/06/20	P. McLauchlan (PM) Work on [REDACTED] on Ranger and Swiber. Coordinate for [REDACTED]	1.10
02/07/20	L. Jimenez-O'Farrill (LJOF) Drafting of the [REDACTED] / Went to the Public Notary to sign the [REDACTED]	5.90
02/10/20	A. Estaba-Herrera (AEH) Conference call with Mexican counsel regarding [REDACTED] [REDACTED].	0.50
02/10/20	L. Jimenez-O'Farrill (LJOF) Draft of [REDACTED] to be filed in Mexico / Corrections of the [REDACTED]	0.70
02/10/20	P. McLauchlan (PM) Work on Mexico [REDACTED] investigate [REDACTED] Review exhibits. Receive and review court documents. Draft client [REDACTED]	2.70
02/11/20	A. Estaba-Herrera (AEH) Review [REDACTED] correspondence related to [REDACTED].	0.10

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 40342153

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Foley Gardere

March 12, 2020

02/11/20	P. McLauchlan (PM) Work on Mexico [REDACTED] Review U.S. court [REDACTED]. Receive and review client correspondence.	1.90
02/12/20	A. Estaba-Herrera (AEH) Prepare for and attend teleconference call with Mexican counsel related to [REDACTED]	0.70
02/12/20	L. Jimenez-O'Farrill (LJOF) Conference call with Anacarolina Estaba and Miguel Angel Hernandez-Romo Valencia for [REDACTED].	0.30
02/12/20	M. Hernandez Romo Valen (MAHR) Conference call with Ana Carolina Esteba.	0.20
02/13/20	A. Estaba-Herrera (AEH) Prepare certificate of interested parties as required by U.S. court.	0.90
02/13/20	P. McLauchlan (PM) Outline documents for [REDACTED] Investigate [REDACTED]	0.60
02/17/20	A. Estaba-Herrera (AEH) Receive and respond to Mexican counsel inquiry related to [REDACTED]	1.50
02/18/20	P. McLauchlan (PM) Receive confirmation of [REDACTED] Coordinate for service via [REDACTED] Work on Mexico [REDACTED] confirmation from official [REDACTED]	0.90
02/26/20	A. Estaba-Herrera (AEH) Follow up with Mexican counsel on [REDACTED]	0.30
02/27/20	A. Estaba-Herrera (AEH) Research [REDACTED] in connection with service of process.	0.50

Hours Total: 21.60

Services Total: \$11,218.50

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 40342153

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Foley Gardere

March 12, 2020

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Dollars
Miguel Angel Hernandez Romo Valen	MAHR	Partner	0.20	\$585.00	\$117.00
Peter McLauchlan	PM	Partner	7.80	\$750.00	\$5,850.00
Laura Jimenez-O'Farrill	LJOF	Associate	8.20	\$327.62	\$2,686.50
Anacarolina Estaba-Herrera	AEH	Special Counsel	5.40	\$475.00	\$2,565.00
Totals			21.60		\$11,218.50



FOLEY GARDERE
1000 LOUISIANA STREET
SUITE 2000
HOUSTON, TEXAS 77002-2099
TELEPHONE (713) 276-5500
FACSIMILE (713) 276-5555
WWW.FOLEY.COM

Dan-Bunkering (America), Inc.

Date: March 12, 2020
Invoice No.: 40342153
Our Ref. No.: 114749-0109

Remittance Advice

Outstanding Invoices:

02/17/20 - 40329588	\$30,041.50
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<i>Prior Outstanding Balance:</i>	<hr/> \$30,041.50
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Current Invoice:

03/12/20 - 40342153	\$11,218.50
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Total Amount Due:	<hr/> \$41,260.00
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Should you wish to remit your payment via check, please mail checks to:

Foley & Lardner LLP
P.O. Box 660256
Dallas, Texas 75266-0256

Should you wish to remit your payment via wire ACH or WIRE transfer, please include invoice no. 40342153 as an addenda or reference and forward to:

Foley & Lardner LLP
Amegy Bank a division of Zions
Bancorporation, N.A.
2501 North Harwood Street
Dallas, Texas 75201
ABA No.: [REDACTED]
Acct. No.: [REDACTED]
Swift Code: [REDACTED]
(foreign wires only)

Please send remittance advice and questions to
TexasAR@foley.com



FOLEY & LARDNER LLP
1000 LOUISIANA STREET
SUITE 2000
HOUSTON, TEXAS 77002-2099
TELEPHONE (713) 276-5500
FACSIMILE (713) 276-5555
WWW.FOLEY.COM

Dan Bunkering (America) Inc.

Attn: [REDACTED]

Email: [REDACTED]

Date: April 24, 2020

Invoice No.: 50002639

Our Ref. No.: 114749-0109

Services through March 31, 2020

Amount due for professional services rendered regarding	\$13,424.50
Swiber Offshore Mexico, Ranger Offshore, Inc. in Personam and M/V	
Swiber ADA in Rem	

Total Expenses:	\$506.72
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Total Amount Due:	\$13,931.22
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Please reference your account number 114749-0109 and your invoice number 50002639 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of our invoice.

Federal Employer Number:

[REDACTED]

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 50002639

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Foley & Lardner LLP

April 24, 2020

Professional Services Detail

Date	Attorney/Description	Hours
03/03/20	A. Estaba-Herrera (AEH) Exchange various correspondence with Mexican counsel regarding [REDACTED].	0.20
03/03/20	L. Jimenez-O'Farrill (LJOF) Preparation for tomorrow's meeting in the Secretariat of Communications and Transport.	0.30
03/04/20	A. Estaba-Herrera (AEH) Various correspondence and conference call with Mexican counsel related to [REDACTED]; prepare report to [REDACTED] related to [REDACTED].	1.00
03/04/20	L. Jimenez-O'Farrill (LJOF) Went to the Secretariat of Communications and Transport: meeting with Angelica Merlos, filing of the requirements of information and certified resolution / Call with Miguel Angel Hernandez-Romo Valencia about [REDACTED] / Drafting of e-mails for Anacarolina Esteban and Peter McLauchlan.	3.50
03/04/20	P. McLauchlan (PM) [REDACTED]. Draft client update.	1.20
03/05/20	A. Estaba-Herrera (AEH) Review memorandum from Mexican counsel related to [REDACTED]; comments to memorandum related to [REDACTED].	0.90
03/05/20	L. Jimenez-O'Farrill (LJOF) Discussion with Miguel Angel Hernandez-Romo about [REDACTED] / Drafting of e-mails / Communication with Miguel Lopez [REDACTED]	0.20
03/06/20	A. Estaba-Herrera (AEH) Attend meeting with Mexican counsel and discuss [REDACTED] and prepare memo for file regarding same.	0.60
03/06/20	L. Jimenez-O'Farrill (LJOF) Went to the Secretariat of Communications and Transport to obtain information about [REDACTED] drafting of e-mails.	2.50

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 50002639

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Foley & Lardner LLP

April 24, 2020

03/06/20	P. McLauchlan (PM) Check [REDACTED]. Prepare for and meet with Mexico counsel regarding [REDACTED]. Draft client chaser regarding [REDACTED].	1.20
03/10/20	L. Jimenez-O'Farrill (LJOF) Went to the Secretariat of Communications and Transport to ask a [REDACTED].	1.50
03/11/20	A. Estaba-Herrera (AEH) Receive and respond to [REDACTED] correspondence regarding [REDACTED]; receive and respond to Mexican lengthy counsel correspondence related to [REDACTED]; receive and respond to Mexican counsel correspondence [REDACTED]; respond to Mexican counsel correspondence related to [REDACTED]; prepare correspondence to Mexican counsel discussing [REDACTED].	2.50
03/17/20	A. Estaba-Herrera (AEH) Research regarding [REDACTED] of defendant in federal court.	0.60
03/17/20	L. Jimenez-O'Farrill (LJOF) Went to the Secretariat of Communications and Transport to require information [REDACTED].	2.00
03/17/20	P. McLauchlan (PM) Confirm s [REDACTED] t.	1.40
03/18/20	A. Estaba-Herrera (AEH) [REDACTED] t; file motion for continuance to file Case Management Plan.	1.00
03/19/20	P. McLauchlan (PM) [REDACTED] s. [REDACTED] [REDACTED]	1.90
03/20/20	A. Estaba-Herrera (AEH) Review court order [REDACTED].	0.20
03/23/20	A. Estaba-Herrera (AEH) Review court order [REDACTED].	0.10
03/24/20	A. Estaba-Herrera (AEH) Follow up with Mexican counsel on [REDACTED] [REDACTED]; follow up Mexican counsel on re [REDACTED].	0.20

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 50002639

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Foley & Lardner LLP

April 24, 2020

03/25/20	L. Jimenez-O'Farrill (LJOF) Went to the Secretariat of Communication and Transport to require information [REDACTED] Call with Miguel Angel Hernandez-Romo / Draft of e-mail for Anacarolina Estaba and Peter mcLauchlan.	2.10
03/26/20	A. Estaba-Herrera (AEH) Receive and respond to Mexican counsel correspondence related to [REDACTED]; receive and respond to Mexican counsel correspondence regarding [REDACTED]; coordinate conference call with Mexican [REDACTED]	0.60
03/26/20	P. McLauchlan (PM) Receive and review [REDACTED] Memo regarding same.	0.30
03/27/20	P. McLauchlan (PM) Check on [REDACTED]	0.60
03/30/20	L. Jimenez-O'Farrill (LJOF) Conference call with Anacarolina Estaba and Miguel Lopez, regarding [REDACTED]	0.30
03/30/20	P. McLauchlan (PM) Receive and review documents [REDACTED] Investigate [REDACTED] Memo [REDACTED]	0.60

Hours Total: 27.50

Services Total: \$13,424.50

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Laura Jimenez-O'Farrill	LJOF	Associate	12.40	\$330.00	\$4,092.00
Peter McLauchlan	PM	Partner	7.20	\$775.00	\$5,580.00
Anacarolina Estaba-Herrera	AEH	Special Counsel	7.90	\$475.00	\$3,752.50
Totals			27.50		\$13,424.50

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 50002639

Page 5

Foley & Lardner LLP

April 24, 2020

Expenses Incurred

Description	Amount
Electronic Legal Research Services	\$1.10
Other Expenses	\$27.51
Service Fees	\$195.00
Translation Charges	\$283.11
Expenses Incurred Total	\$506.72

Certain services and expenses, which involve payments made to third parties, include an additional charge based upon our internal costs with respect to those services and expenses.



FOLEY & LARDNER LLP
1000 LOUISIANA STREET
SUITE 2000
HOUSTON, TEXAS 77002-2099
TELEPHONE (713) 276-5500
FACSIMILE (713) 276-5555
WWW.FOLEY.COM

Dan Bunkering (America) Inc.
Attn: [REDACTED]

Email: [REDACTED]

Date: April 24, 2020
Invoice No.: 50002639
Our Ref. No.: 114749-0109

Remittance Advice

Current Invoice:

04/24/20 - 50002639 \$13,931.22

Total Amount Due: \$13,931.22

Should you wish to remit your payment via check, please mail checks to:

Foley & Lardner LLP
P.O. Box 660256
Dallas, Texas 75266-0256

Should you wish to remit your payment via wire ACH or WIRE transfer, please include invoice no. 50002639 as an addenda or reference and forward to:

Foley & Lardner LLP
Amegy Bank a division of Zions
Bancorporation, N.A.
2501 North Harwood Street
Dallas, Texas 75201
ABA No.: [REDACTED]
Acct. No.: [REDACTED]
Swift Code: [REDACTED]
(foreign wires only)

Please send remittance advice and questions to
TexasAR@foley.com



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HOUSTON, TEXAS 77002-2099
TELEPHONE (713) 276-5500
FACSIMILE (713) 276-5555
WWW.FOLEY.COM

Dan Bunkering (America) Inc.

Attn: [REDACTED]

Email: [REDACTED]

Date: April 24, 2020

Invoice No.: 50002639

Our Ref. No.: 114749-0109

Services through March 31, 2020

Amount due for professional services rendered regarding	\$13,424.50
Swiber Offshore Mexico, Ranger Offshore, Inc. in Personam and M/V	
Swiber ADA in Rem	

Total Expenses:	\$506.72
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Total Amount Due:	\$13,931.22
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Please reference your account number 114749-0109 and your invoice number 50002639 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of our invoice.

Federal Employer Number:

[REDACTED]

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 50002639

Page 2

Foley & Lardner LLP

April 24, 2020

Professional Services Detail

Date	Attorney/Description	Hours
03/03/20	A. Estaba-Herrera (AEH) Exchange various correspondence with Mexican counsel regarding [REDACTED].	0.20
03/03/20	L. Jimenez-O'Farrill (LJOF) Preparation for tomorrow's meeting in the Secretariat of Communications and Transport.	0.30
03/04/20	A. Estaba-Herrera (AEH) Various correspondence and conference call with Mexican counsel related to [REDACTED]; prepare report to [REDACTED] related to [REDACTED].	1.00
03/04/20	L. Jimenez-O'Farrill (LJOF) Went to the Secretariat of Communications and Transport: meeting with Angelica Merlos, filing of the requirements of information and certified resolution / Call with Miguel Angel Hernandez-Romo Valencia about [REDACTED] / Drafting of e-mails for Anacarolina Esteban and Peter McLauchlan.	3.50
03/04/20	P. McLauchlan (PM) [REDACTED]. Draft client update.	1.20
03/05/20	A. Estaba-Herrera (AEH) Review memorandum from Mexican counsel related to [REDACTED]; comments to memorandum related to [REDACTED].	0.90
03/05/20	L. Jimenez-O'Farrill (LJOF) Discussion with Miguel Angel Hernandez-Romo about [REDACTED] / Drafting of e-mails / Communication with Miguel Lopez [REDACTED]	0.20
03/06/20	A. Estaba-Herrera (AEH) Attend meeting with Mexican counsel and discuss [REDACTED] and prepare memo for file regarding same.	0.60
03/06/20	L. Jimenez-O'Farrill (LJOF) Went to the Secretariat of Communications and Transport to obtain information about [REDACTED] drafting of e-mails.	2.50

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 50002639

Page 3

Foley & Lardner LLP

April 24, 2020

03/06/20	P. McLauchlan (PM) Check [REDACTED]. Prepare for and meet with Mexico counsel regarding [REDACTED]. Draft client chaser regarding [REDACTED].	1.20
03/10/20	L. Jimenez-O'Farrill (LJOF) Went to the Secretariat of Communications and Transport to ask a [REDACTED].	1.50
03/11/20	A. Estaba-Herrera (AEH) Receive and respond to [REDACTED] correspondence regarding [REDACTED]; receive and respond to Mexican lengthy counsel correspondence related to [REDACTED]; receive and respond to Mexican counsel correspondence [REDACTED]; respond to Mexican counsel correspondence related to [REDACTED]; prepare correspondence to Mexican counsel discussing [REDACTED].	2.50
03/17/20	A. Estaba-Herrera (AEH) Research regarding [REDACTED] of defendant in federal court.	0.60
03/17/20	L. Jimenez-O'Farrill (LJOF) Went to the Secretariat of Communications and Transport to require information [REDACTED].	2.00
03/17/20	P. McLauchlan (PM) Confirm s [REDACTED] t.	1.40
03/18/20	A. Estaba-Herrera (AEH) [REDACTED] t; file motion for continuance to file Case Management Plan.	1.00
03/19/20	P. McLauchlan (PM) [REDACTED] s. [REDACTED] [REDACTED]	1.90
03/20/20	A. Estaba-Herrera (AEH) Review court order [REDACTED].	0.20
03/23/20	A. Estaba-Herrera (AEH) Review court order [REDACTED].	0.10
03/24/20	A. Estaba-Herrera (AEH) Follow up with Mexican counsel on [REDACTED] [REDACTED]; follow up Mexican counsel on re [REDACTED].	0.20

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 50002639

Page 4

Foley & Lardner LLP

April 24, 2020

03/25/20	L. Jimenez-O'Farrill (LJOF) Went to the Secretariat of Communication and Transport to require information [REDACTED] Call with Miguel Angel Hernandez-Romo / Draft of e-mail for Anacarolina Estaba and Peter mcLauchlan.	2.10
03/26/20	A. Estaba-Herrera (AEH) Receive and respond to Mexican counsel correspondence related to [REDACTED]; receive and respond to Mexican counsel correspondence regarding [REDACTED]; coordinate conference call with Mexican [REDACTED]	0.60
03/26/20	P. McLauchlan (PM) Receive and review [REDACTED] Memo regarding same.	0.30
03/27/20	P. McLauchlan (PM) Check on [REDACTED]	0.60
03/30/20	L. Jimenez-O'Farrill (LJOF) Conference call with Anacarolina Estaba and Miguel Lopez, regarding [REDACTED]	0.30
03/30/20	P. McLauchlan (PM) Receive and review documents [REDACTED] Investigate [REDACTED] Memo [REDACTED]	0.60

Hours Total: 27.50

Services Total: \$13,424.50

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Laura Jimenez-O'Farrill	LJOF	Associate	12.40	\$330.00	\$4,092.00
Peter McLauchlan	PM	Partner	7.20	\$775.00	\$5,580.00
Anacarolina Estaba-Herrera	AEH	Special Counsel	7.90	\$475.00	\$3,752.50
Totals			27.50		\$13,424.50

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 50002639

Page 5

Foley & Lardner LLP

April 24, 2020

Expenses Incurred

Description	Amount
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Other Expenses	\$27.51
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Expenses Incurred Total	\$506.72

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Attn: [REDACTED]

Email: [REDACTED]

Date: April 24, 2020
Invoice No.: 50002639
Our Ref. No.: 114749-0109

Remittance Advice

Current Invoice:

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Dan Bunkering (America) Inc.

Attn: [REDACTED]

Date: May 28, 2020

Our Ref. No.: 114749-0109

Email: [REDACTED]

Statement of Account

Outstanding Invoices:

Date	Invoice No.	Amount	Credits	Balance
04/24/2020	50002639	\$13,931.22	\$0.00	\$13,931.22
Total Balance Outstanding:				\$13,931.22

Current Invoice:

Date	Invoice No.	Amount	Credits	Balance
05/28/2020	50018085	\$8,297.10	\$0.00	\$8,297.10
Total Amount Due:				\$22,228.32

Please reference your account number 114749-0109 and your invoice number 50018085 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of our invoice.

Federal Employer Number:

[REDACTED]



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1000 LOUISIANA STREET
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HOUSTON, TEXAS 77002-2099
TELEPHONE (713) 276-5500
FACSIMILE (713) 276-5555
WWW.FOLEY.COM

Dan Bunkering (America) Inc.

Attn: [REDACTED]

Email: [REDACTED]

Date: May 28, 2020

Invoice No.: 50018085

Our Ref. No.: 114749-0109

Services through April 30, 2020

Amount due for professional services rendered regarding Swiber Offshore Mexico, Ranger Offshore, Inc. in Personam and M/V Swiber ADA in Rem	\$15,291.50
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Courtesy Discount:	(\$7,000.00)
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Total Services:	\$8,291.50
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Total Expenses:	\$5.60
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Amount Due:	\$8,297.10
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Federal Employer Number:

[REDACTED]

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 50018085

Page 2

Foley & Lardner LLP

May 28, 2020

Professional Services Detail

Date	Attorney/Description	Hours
04/01/20	P. McLauchlan (PM) Investigate [REDACTED] Work on service of [REDACTED] Memo regarding same.	1.30
04/09/20	P. McLauchlan (PM) Receive and review update on SWIGET in Singapore. Outline [REDACTED] Ranger Offshore. Teleconference regarding same.	0.90
04/13/20	A. Estaba-Herrera (AEH) Prepare motion [REDACTED] [REDACTED] research in connection with [REDACTED] against Ranger Offshore; follow up with Mexican counsel on [REDACTED].	2.50
04/13/20	L. Jimenez-O'Farrill (LJOF) Drafting of emails to Anacarolina Estaba about [REDACTED].	0.30
04/13/20	P. McLauchlan (PM) Work on [REDACTED] against Ranger. Draft correspondence regarding same.	1.20
04/14/20	P. McLauchlan (PM) Coordinate for [REDACTED] view court documents.	0.60
04/15/20	A. Estaba-Herrera (AEH) Review court order [REDACTED] prepare court request for [REDACTED] review Mexican counsel's correspondence related to [REDACTED]; follow up with bond company in Mexico related to requirements to [REDACTED].	2.90
04/16/20	A. Estaba-Herrera (AEH) Follow up correspondence [REDACTED] Mexico arrest.	0.10
04/16/20	L. Jimenez-O'Farrill (LJOF) Call with Miguel Angel Hernández-Romo Valencia about [REDACTED].	0.50

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 50018085

Page 3

Foley & Lardner LLP

May 28, 2020

04/16/20	P. McLauchlan (PM) Finalize [REDACTED] Prepare for and attend to teleconference [REDACTED].	1.70
04/17/20	A. Estaba-Herrera (AEH) Review Court order regarding [REDACTED] against Ranger Offshore.	0.20
04/17/20	L. Jimenez-O'Farrill (LJOF) Drafting of emails for the Secretariat of Communications and Transport and for Anacarolina Estaba.	0.50
04/17/20	P. McLauchlan (PM) Receive and review court documents. Outline [REDACTED]	1.20
04/20/20	A. Estaba-Herrera (AEH) Return call to [REDACTED] commence researching [REDACTED] commence drafting [REDACTED]	2.50
04/20/20	P. McLauchlan (PM) Collate [REDACTED] t.	0.30
04/21/20	A. Estaba-Herrera (AEH) Continue preparing motion [REDACTED] thereto; review court notice [REDACTED] review [REDACTED] company correspondence regarding requirements for [REDACTED] and request additional information; review follow up correspondence from bonding company; review correspondence from Mexican counsel regarding [REDACTED].	3.50
04/21/20	P. McLauchlan (PM) Receive and review order from court. [REDACTED]. Investigate [REDACTED] [REDACTED] Outline [REDACTED] against Ranger.	0.80
04/22/20	A. Estaba-Herrera (AEH) Research regarding [REDACTED] [REDACTED]; make Peter McLauchlan's revisions to pleadings [REDACTED]: motion, order and supportive declarations.	1.10
04/22/20	P. McLauchlan (PM) Review court documents. Work on motion [REDACTED] Outline and finalize [REDACTED] Work on witness declaration. Coordinate [REDACTED] on Swiber.	1.80

Dan-Bunkering (America), Inc.

Our Ref. No.: 114749-0109

Invoice No.: 50018085

Page 4

Foley & Lardner LLP

May 28, 2020

04/23/20	A. Estaba-Herrera (AEH) Update pleadings and exhibits to [REDACTED] with interest rate; prepare correspondence to [REDACTED] for [REDACTED].	0.90
04/23/20	P. McLauchlan (PM) Finalize [REDACTED] regarding same. Work on [REDACTED]	0.60
04/27/20	P. McLauchlan (PM) Follow-up correspondence regarding [REDACTED]	0.30
04/28/20	L. Jimenez-O'Farrill (LJOF) Call with the Secretariat of Communications and Transport / Setting a date to [REDACTED]	1.00

Hours Total: 26.70

Subtotal: \$15,291.50

Courtesy Discount: (\$7,000.00)

Services Total: \$8,291.50

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Laura Jimenez-O'Farrill	LJOF	Associate	2.30	\$330.00	\$759.00
Peter McLauchlan	PM	Partner	10.70	\$750.00	\$8,025.00
Anacarolina Estaba-Herrera	AEH	Special Counsel	13.70	\$475.00	\$6,507.50
Totals			26.70		\$15,291.50

Expenses Incurred

Description	Amount
Electronic Legal Research Services	\$5.60
Expenses Incurred Total	\$5.60

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HOUSTON, TEXAS 77002-2099
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FACSIMILE (713) 276-5555
WWW.FOLEY.COM

Dan Bunkering (America) Inc.

Attn: [REDACTED]

Email: [REDACTED]

Date: May 28, 2020

Invoice No.: 50018085

Our Ref. No.: 114749-0109

Remittance Advice

Outstanding Invoices:

04/24/20 - 50002639	\$13,931.22
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Prior Outstanding Balance:	<hr/> \$13,931.22
----------------------------	-------------------

Current Invoice:

05/28/20 - 50018085	\$8,297.10
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Total Amount Due:	<hr/> \$22,228.32
-------------------	-------------------

Please mail check payments to:

Foley & Lardner LLP
P.O. Box 78470
Milwaukee, WI 53278-8470

Foley & Lardner LLP's preferred payment method is ACH (CTX or CCD+ transmission) with invoice number(s) included in the addenda of the ACH.

Please send electronic payment remittance advice and questions to accountsreceivable@foley.com.

Foley & Lardner LLP
U.S. Bank, NA
777 E. Wisconsin Ave.
Milwaukee, WI 53202
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Attn: [REDACTED]

Date: May 28, 2020

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Email: [REDACTED]

Date: May 28, 2020

Invoice No.: 50018085

Our Ref. No.: 114749-0109

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Total Services:	\$8,291.50
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Total Expenses:	\$5.60
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Dan-Bunkering (America), Inc.
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Page 2
 Foley & Lardner LLP
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Dan-Bunkering (America), Inc.

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Foley & Lardner LLP

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04/23/20	P. McLauchlan (PM) Finalize [REDACTED] regarding same. Work on [REDACTED]	0.60
04/27/20	P. McLauchlan (PM) Follow-up correspondence regarding [REDACTED]	0.30
04/28/20	L. Jimenez-O'Farrill (LJOF) Call with the Secretariat of Communications and Transport / Setting a date to [REDACTED]	1.00

Hours Total: 26.70

Subtotal: \$15,291.50

Courtesy Discount: (\$7,000.00)

Services Total: \$8,291.50

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Dan Bunkering (America) Inc.

Attn: [REDACTED]

Email: [REDACTED]

Date: May 28, 2020

Invoice No.: 50018085

Our Ref. No.: 114749-0109

Remittance Advice

Outstanding Invoices:

04/24/20 - 50002639	\$13,931.22
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<i>Prior Outstanding Balance:</i>	<hr/> \$13,931.22
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Current Invoice:

05/28/20 - 50018085	\$8,297.10
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Total Amount Due:	<hr/> \$22,228.32
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